

REMARKS

The office action dated June 3, 2005 and the references cited therein have been carefully considered together with the present application and claim 5 has been amended to incorporate the subject matter of claims 1 and 4 to place claim 5 in independent form inasmuch as the examiner indicated that claims 5 and 6 contain allowable subject matter and were only objected to as being dependent upon a rejected base claim. It is therefore believed that claims 5 and 6 as well as the dependent claims that refer to the claims, namely, claims 10, 11 and 12 are in condition for immediate allowance.

The examiner has rejected all claims under 35 U.S.C. 102(e) as being anticipated by Hauduc. As is well known, an invention is anticipated only if the same device, including *all* the claim limitations, is shown in a single prior art reference. Every element of the claimed invention must be literally present, arranged as in the claims in question. *Scripps Clinic and Research Found. v. Genentech, Inc.*, 927 F.2d 1565, 1576 (Fed. Cir. 1991); *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548 (Fed. Cir. 1983). The *identical* invention must be shown by the prior art reference in as much detail as is contained in the patent claim. *Richardson v. Suzuki Motor Co., Ltd.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); *Continental Can Co. v. Monsanto Co.*, 948 F.2d 1264, 1267 (Fed. Cir. 1991); *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 780 (Fed. Cir. 1985).

Applicant respectfully traverses this rejection for the reason that it is not believed that Hauduc anticipates, teaches or suggests the method of claim 1 as claimed in the application. While Hauduc is generally relevant for the reason that it discloses a system and method for providing language localization for server based applications, it is for the purpose of providing a computer application from a network to a client rather than converting text characters from a standard generalized mark-up language file into another specified language. Moreover, applicant's claim 1 includes in its preamble that it is a method for converting text characters ... using a CONVERSTR variable, a

HDMLCODE variable, and a VAL variable, wherein each character represents a tag or text and each tag has a start and an end with the method comprising several steps.

It is believed that the steps that are recited in the claim simply are not anticipated by Hauduc, nor do they teach or suggest the claimed steps. Referring to the specific defined steps, the first step is that of reading a character from the file. The examiner indicates that this step is anticipated by column 6, lines 32-38, but it is submitted that this text does not anticipate this step for the reason that the local string object referred to, i.e., local string object 235, looks at a list of the language packs on the server 3 and selects the language pack 248 corresponding to the language variable. It is this language pack 240a that will be used to convert or localize the string elements in the application into a particular language. It is submitted that the local string object 235 is not a character from the file. It is a language identification and is therefore different.

The next step of determining whether the read character is the start of a tag is stated to be anticipated by the text of column 6, lines 39-57. However, a review of this text reveals that there is no determination made as to whether a particular character that is read is in fact the start of a tag, in the middle of a tag or at the end of a tag. It simply discusses the mapping process and does not anticipate, teach or suggest this determining step. Since it does not do so, it also fails to anticipate, teach or suggest the subsequent step of adding the read character to the CONVERTSTR variable when the read character is not the start of a tag, which is purportedly done in the identified text at column 6, lines 39-57. However, there is no discussion that even comes close to this step because there is no determination performed that is comparable to determining whether the read character is the start of a tag and therefore there is no operation comparable to adding the read character to the CONVERSTR variable as set forth in the claim. Since none of these three steps are anticipated, taught or suggested by Hauduc, the step of repeating the foregoing discussed steps for a next character until a read character is the start of a tag is simply not done and therefore this step is neither anticipated, taught or suggested by

Hauduc. For these reasons, it is believed that claim 1 is allowable and reconsideration and allowance is respectfully requested.

For the same reasons, the system of claim 14 and the computer program product of claim 15 are also believed to be allowable and reconsideration and allowance of these claims is also respectfully requested.

Finally, since the dependent claims that depend from these independent claims necessarily include the features of those independent claims and in addition define other features or functionality not found in those claims, it is believed that the dependent claims are also in condition for immediate allowance and such action is also respectfully requested.

For the foregoing reasons, reconsideration and allowance of all pending claims in this application is respectfully requested.

Respectfully submitted,

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September 1, 2005

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